

COZEN O’CONNOR

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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

LISA BARBOUNIS	:	
	:	
Plaintiff,	:	CIVIL ACTION
	:	
-vs-	:	NO. 2:19-cv-05030-JDW.
	:	
	:	
THE MIDDLE EAST FORUM and	:	
GREG ROMAN (<i>individually</i>),	:	
Defendants.	:	TRIAL BY JURY
	:	
	:	DEFENDANT’S MOTION TO
	:	AMEND ANSWER TO ASSERT
	:	COUNTERCLAIMS
	:	

For the reasons set forth in the accompanying memorandum of law, Defendant/Counterclaim Plaintiff The Middle East Forum (“MEF”) moves, pursuant to Federal Rule of Civil Procedure 15, for leave to amend its answer to assert Counterclaims against Plaintiff/Counterclaim Defendant Lisa Barbounis (“Barbounis”) based on newly discovered evidence that Barbounis breached her duty of loyalty to MEF, engaged in a conspiracy to facilitate and cover up the misappropriation of funds from MEF, and engaged in fraudulent misrepresentation in order to conceal the misappropriation of MEF funds and to maintain her employment with MEF (collectively, the “Counterclaims”). This newly discovered evidence

reveals that Barbounis' unlawful actions toward MEF were in furtherance of her scheme to abandon her duties as an employee and director of MEF, to illicitly divert MEF funds from their rightful recipients and into the hands of her paramour, and to cover her tracks with deception and threats.

The Counterclaims are set forth in at Paragraphs 482 to 638 of the attached Amended Answer with Affirmative Defenses to Plaintiff's Amended Complaint and Counterclaims. For the reasons that follow in the accompanying Memorandum, MEF's Motion should be granted.

Respectfully submitted,

Dated: July 28, 2020

COZEN O'CONNOR

s/David J. Walton

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CERTIFICATE OF SERVICE

I hereby certify that I served upon Seth Carson, Esq. a true and correct copy of the within Motion to Amend Answer to Assert Counterclaims and the accompanying Memorandum of Law via ECF filing.

/s/ David J. Walton

David J. Walton, Esquire

COZEN O'CONNOR

*Attorney for Defendants,
The Middle East Forum and Gregg Roman*

Dated: July 28, 2020